

William F. Adler
Executive Director
Federal Regulatory Relations

1775 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 383-6431

Mr. William F. Caton

PACIFIC X TELESIS
Group-Washington

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MAR 21 1994

March 21, 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

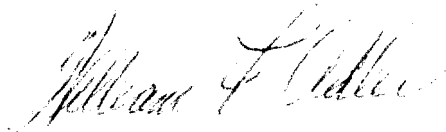
Dear Mr. Caton:

Re: CC Docket No. 92-297

On behalf of Pacific Telesis Group, please find enclosed an original and six copies of its "*Comments and Application for Membership of Pacific Telesis Group*" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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MAR 21 1994

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Rulemaking to Amend Part 1 and Part 21) CC Docket No. 92-297
of the Commission's Rules to Redesignate)
the 27.5 - 29.5 GHz Frequency Band and) RM-7872; RM-7722
to Establish Rules and Policies for)
Local Multipoint Distribution Service)

COMMENTS AND APPLICATION FOR MEMBERSHIP
OF PACIFIC TELESIS GROUP

Pacific Telesis Group files these Comments and Application for Membership in response to the Commission's "Public Notice" issued February 11, 1994 in the above matter. We support the establishment of the proposed Federal Advisory Committee and feel that such a Committee can best devise appropriate regulation for the 28 GHz spectrum band. As proposed by the Commission, the Committee will represent a variety of interests and viewpoints; we expect the Committee to give full consideration to many significant spectrum sharing and other regulatory issues.

We respectfully request that Pacific Telesis Group be included as a member of the proposed Advisory Committee. We believe that we would be a valuable addition to the Committee for two reasons.

First, our research and development subsidiary, Telesis Technologies Laboratory, Inc. ("TTL"), has entered into a Cooperative Research and Development Agreement with the

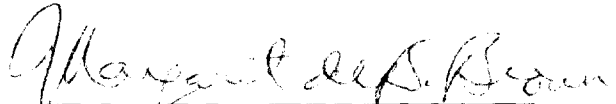
National Telecommunications and Information Administration, Institute for Telecommunication Sciences ("ITS"). Pursuant to this agreement, ITS has conducted research, financed by TTL, into the propagation effects in the 27.5-29.5 GHz band. These effects must be considered in planning for the development of Local Multipoint Distribution Services (LMDS) and for the resolution of spectrum sharing issues. In accordance with the research agreement, the parties intend to publish the results of the research at a future date. These efforts, and the knowledge of the propagation effects in this spectrum band which we have gained, qualify us for membership on the Advisory Committee which will be considering regulation and spectrum sharing in this band.

Second, we believe that the Bell Regional Holding Companies are underrepresented on the proposed Advisory Committee. While we are sure that the Bell Atlantic Companies will make a valuable contribution to the Committee, we believe that an additional RHC member is desirable. Pacific Telesis Group would be especially suited to Committee membership, because we are focused on new uses of spectrum such as LMDS and PCS (as opposed to existing spectrum uses such as cellular). We will have no cellular affiliates after April 1, 1994, when our present wireless affiliates, including our cellular affiliates, will be spun off. Thus we would be particularly motivated to assist in the important work of the Advisory

Committee. We are committed to actively participate in good faith in the development of the rules under consideration.

Respectfully submitted,

PACIFIC TELESIS GROUP


MARGARET deB. BROWN

130 Kearny Street, Room 3659
San Francisco, CA 94108
(415) 394-3550

JAMES L. WURTZ

1275 Pennsylvania Avenue, N.W.
4th Floor
Washington, D.C. 20004
(202) 383-6472

Its Attorneys

Date: March 21, 1994